

FAR 145 Repair Station Rating System Review Survey

General Commentary Received Outside the Survey Form (All from Repair Stations)

1. Reticence to comment (fill out the form) lest the PMI find out. Names were removed in this compilation.
2. Obtaining a revised rating is normally not an issue however it depends upon the local PMI. There is a belief, and some factual evidence to support that belief, that ratings are more difficult to obtain in some regions than others. In discussions, there are strong indications that there is no national / international FAA standard for ratings.
3. Changes in PMI's, without other changes in the repair station's operations, sometimes result as challenges to or changes of ratings that may adversely affect the repair stations.
4. PMIs use the ratings systems in conjunction with Appendix A to insist that a repair station have within the repair station (not just have access to) all the equipment and materials for the job functions of Appendix A. For example, a PMI has taken the position that unless a Repair Station has, within the repair station, all the equipment and materials in Appendix A for all the job functions (even those with an asterisk), all that can be issued is a limited rating with operations specifications. One example was given of a PMI who wanted to limit a rating because the repair station intended to offload a function to another certificated station to reduce a developing backlog.
5. There is the ambiguity about the scope of limited ratings. For example, the regulations say: "Limited Ratings are issued for – ...(2) Engines of a particular make and model." This is very close to a Class 3 Powerplant rating.
6. Although 14 CFR 145.2 appears to hold a repair station to meeting the requirements of 14 CFR 121 Subpart L and this would indicate that the other 145 requirements apply, including ratings, there is a position that says the shop is not working under 145 when working for a 121. The position continues that no certification and definitely no rating are necessary for shops working for 14 CFR 121 air carriers. This interpretation is based on HBAW 96-05CW, particularly the 3rd paragraph of Section 6.F: "In addition, the inspections described herein should not be designed to determine compliance with any provisions of 14 CFR part 145." In other words, 145 compliance does not matter to a 121. The maintenance requirements for 121 operators derive from and are controlled by Subpart L. Also, It may also be significant to note that 14 CFR section 121.709 requires the signature of an authorized certificated mechanic to sign the air carrier airworthiness release. There is no provision for a repair station to sign the airworthiness release.

Attachment 4

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INSTRUCTIONS: The current Part 145 rating system is outlined in the table below. Please provide your perspective on the scope, usefulness, and issues associated with each rating. Only complete those sections with which you have experience or familiarity. Do not submit more than one survey.

Aviation Affiliation (e.g., FAA, Repair Station, Maintenance Technician, Customer): AIA

Name and Contact Information (optional): Joe Sirico; Skip Jones

Rating	Scope What do you think are the privileges and limitations of this rating?	Usefulness Is this rating necessary? (Yes/No) Please explain.	Issues State any issues that you have experienced with the rating.
AIRFRAME			
Airframe Class 1: Composite Construction Small Aircraft			
Airframe Class 2: Composite Construction Large Aircraft			
Airframe Class 3: All-metal Construction Small Aircraft	Maintenance of US. registered small (< 12,500 Lb. GWT.) all metal aircraft of any manufacturer, make, or model for which maintenance data, tools and trained personnel are available. Our repair station has used this rating for many years.	This rating is very useful, allowing maintenance to be performed on a broad range of aircraft without additional applications.	
Airframe Class 4: All-metal Construction	Maintenance of US. registered large (> 12,500 Lb. GWT.) all metal aircraft of any manufacturer, make, or model for which maintenance data, tools and trained personnel are available.		Several years ago I was told by my local FSDO that there was no way a this rating could be obtained by a small shop, and was doubtful for even a very large one (if this is true, what is the necessity of this rating).
Limited: Airframes of a particular make and model	Allows repair/ overhaul of all components associated with a particular make and model of aircraft.	This rating is necessary it gives the OEM latitude to repair entire aircraft or single component.	Have had some confusion with what can be off-loaded to in accordance with appendix A with the ASI.
	Maintenance of particular make and model of aircraft, US. registered only as listed on the repair station limitations. Our repair station has used this rating for many years for working on large aircraft.	This rating is cumbersome, requiring frequent update and revisions as new projects (aircraft) are obtained and old ones are completed.	None
	Essential to our business for the type of aircraft visiting this R/S. The limitations are acceptable.	Yes – This R/S does not manufacture aircraft.	None
POWERPLANT			
Powerplant Class 1: Reciprocating engines of 400 HP or less			

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Rating	Scope What do you think are the privileges and limitations of this rating?	Usefulness Is this rating necessary? (Yes/No) Please explain.	Issues State any issues that you have experienced with the rating.
Powerplant Class 2: Reciprocating engines of more than 400 HP			
Powerplant Class 3: Turbine Engines			
Limited: Engines of a particular make and model	Essential to our business for the type of aircraft visiting this R/S The limitations are acceptable.	Yes – Limited capabilities of R/S	None
	Privileges: Competitors should not be provided work without providing the FAA with evidence proving capabilities. Limitations: Duplication of procedures, on-site audits, records, etc. when attempting to add additional models of similar components to capabilities list. Ex.: although particular airseals in a particular engine differ only by a few physical characteristics, the process methods, equipment (with the possible exception of fixturing), training, etc. are identical. Due to one PMI's lack of familiarity, each airseal of each engine model must be reviewed and added to the certificate individually rather than looking at the broader picture – a repair shop wholly owned by the OEM with OEM Tech Data and tooling working on similar engine components using identical processes.	Definitely - if applied appropriately (see Limitations in Scope) and fairly (all PMI's follow the same practice at all facilities).	Extreme variance of ratings assessment and approval among PMI's.
	Maintenance of particular make and model of aircraft engine, only as listed on the repair station limitations. Our repair station has used this rating on a limited basis for years.	This rating has worked well only because it has a very limited use in this repair station.	
PROPELLER			
Propeller Class 1: All fixed pitch& ground adjustable propellers of wood, metal, or composite construction			
Propeller Class 2: All other propellers, by make			
Limited: Propellers of a particular make and model			
RADIO			
Radio Class 1: Communication			

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Rating	Scope What do you think are the privileges and limitations of this rating?	Usefulness Is this rating necessary? (Yes/No) Please explain.	Issues State any issues that you have experienced with the rating.
Equipment			
Radio Class 2: Navigational equipment			
Radio Class 3: Radar equipment			
Limited: Radio equipment of a particular make and model	Maintenance of products designed and manufactured by OEM as a Production Approval Holder, PAH, and put in this category by managing office.	Necessity.	Question need for this rating once facility is found to be creditable in one of the classes. The current FAA audit function is seen as better tool to monitor capability on additional products and compliance to requirements.
	Maintenance of particular make and model of aircraft radio, only as listed on the repair station limitations.	The rating is used by this R/S for installation, functional testing and line maintenance (excluding component repair) of aircraft radio systems. **	
INSTRUMENT	INSTRUMENT		
Instrument Class 1: Mechanical			
Instrument Class 2: Electrical			
Instrument Class 3: Gyroscopic			
Instrument Class 4: Electronic			
Limited: Instruments of a particular make and model	Maintenance of products designed and manufactured by OEM as a Production Approval Holder, PAH, and put in this category by managing office.	Necessity.	Question need for this rating once facility is found to be creditable in one of the classes. The current FAA audit function is seen as better tool to monitor capability on additional products and compliance to requirements.
	Allowed to perform maintenance on all instruments of a particular model and make.	Yes only if this is all you are limited to.	ASI made R/S change limited airframe rating to include this rating.
	Maintenance of particular make and model of aircraft instrument, only as listed on the repair station limitations.	The rating is used by this repair station for installation, functional testing and line maintenance (excluding component repair) of aircraft instrument systems. **	

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ACCESSORY			
Accessory Class 1: Mechanical	Maintenance of products designed and manufactured by OEM as a Production Approval Holder, PAH.	Necessity.	No issue.
Accessory Class 2: Electrical	Maintenance of products designed and manufactured by OEM as a Production Approval Holder, PAH.	Necessity.	No issue.
Accessory Class 3: Electronic	Maintenance of products designed and manufactured by OEM as a Production Approval Holder, PAH.	Necessity.	No issue.
Limited: Accessories of a particular make and model	Maintenance of products designed and manufactured by OEM as a Production Approval Holder, PAH, and put in this category by managing office.	Necessity.	Question need for this rating once facility is found to be creditable in one of the classes. The current FAA audit function is seen as better tool to monitor capability on additional products and compliance to requirements.
	Allowed to perform maintenance on all accessories of a particular model and make.	Yes only if this is all you are limited to.	ASI made R/S change limited airframe rating to include this rating.
LIMITED (other than those listed above)			
Limited Landing Gear Components			
Limited Floats, by make			
Limited Nondestructive inspection, testing and processing	Maintenance of products designed and manufactured by OEM as a Production Approval Holder, PAH.	Necessity.	No issue.
Limited Emergency Equipment			
Limited Rotor blades, by make and model			
Limited Aircraft fabric work			
Limited: Any other purpose as determined by the Administrator	Privilege: enables R/S to incorporate new services/businesses	YES, enables specific activities Yes – Limited capabilities of RS	Currently expanding coatings capability and customers demand certificate.
	Essential to our business for the type of aircraft visiting this R/S The limitations are acceptable.		None
Limited specialized service	It allows us to offer customers maintenance services of products designed and manufactured by OEM as a Production Approval Holder, PAH.	Necessity.	No issue.
	Performance of specialized tests and / or inspections of aircraft, aircraft engines, or components thereof as listed on the repair station limitations.	The rating was used by this repair station for the testing of Pitot Static systems and Transponder Systems (91.411 & 91.413).	

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** This repair station is almost exclusive for the purpose of supporting a Designated Alteration Station (DAS) for the installation and certification of Avionics Systems in a broad range of Part 23, 25, and 27 aircraft (ranging from small single engine aircraft to wide bodied transports to small helicopters).

As currently written, repair station limitations (FAR § 145 Appendix A) do not support the installation of avionics systems, but appear to only apply to circuitry inside the avionics appliances (which we do not repair).

For the purpose of avionics installations only, the FSDO has required this repair station to maintain: limited instrument, Radio – Communications, Radio – Navigation and Radio – other, ratings (as well as Airframe class 3 and Airframe limited ratings).

This repair station does not repair appliances (only install them), yet the limitations we work under are all geared for the internal maintenance of avionics appliances.

It would not be prudent to discard all limitations, but there is a definite need for repair stations to customized their limitations to the actual work they have the capability to accomplish, not a generic list of functions that may have little relevance to actual field conditions.